

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

FLEXCEL, INC.,	*	
Plaintiff,	*	
v.	*	Civil Action No. AMD 02CV3825
LUI CORPORATION, <i>et al.</i>,	*	
Defendants.	*	

* * * * *

JOINT MOTION FOR EXTENSION OF DEADLINES

Plaintiff, Flexcel, Inc. (“Flexcel”), by Theodore P. Stein, Esquire, with Theodore P. Stein P.C., its attorney, and Defendant, LUI Corporation (“LUI”), by Daniel P. Moylan and James A. Dunbar, with Venable LLP, its attorneys, pursuant to F.R.Civ.P. 6(b) and Local Rule 105, file this joint motion for extension of deadlines and state as follows:

1. The above-captioned action arises, *inter alia*, out of Flexcel’s allegation that LUI, a furniture supplier, breached its contract with Flexcel for the manufacture and supply of furniture. Flexcel claims damages as a result of LUI's alleged failure to make payments to Flexcel under the terms of the contract.

2. LUI answered the Complaint and filed a counterclaim against Flexcel arising out of its alleged failure to manufacture and deliver furniture for LUI's customers on a timely basis.

3. The parties agreed to an early settlement proceeding and limited deposition time for fact witnesses. Thereafter, the case was referred to the Honorable

James K. Bredar, United States Magistrate Judge for the District of Maryland, for an early settlement conference.

4. The settlement conference was held on August 19, 2003, but the parties were unable to reach a settlement agreement at that time. Nevertheless, the parties are engaging in further settlement discussions that may lead to a resolution of the case.

5. This Court's initial scheduling order established the following deadlines, among others:

Discovery	09/15/03
Submission of Status Report	09/15/03
Requests for Admission	09/22/03
Dispositive Pretrial Motions	10/14/03

6. The parties, through their counsel, have discussed extending these deadlines, without affecting the March 2004 trial period. They jointly propose extension as follows:

Discovery	10/17/03
Submission of Status Report	10/17/03
Requests for Admission	10/24/03
Dispositive Pretrial Motions	11/17/03

WHEREFORE, Plaintiff Flexcel, Inc., and Defendant LUI Corporation respectfully request that this Honorable Court grant their Joint Motion for Extension of Deadlines.

_____/s/
Theodore P. Stein
Federal Bar No. 05385
50 Monroe Street
Suite 1200
Rockville, Maryland 20850
(301) 424-9377
(301) 424-9430 (fax)

*Attorney for Plaintiff
Flexcel, Inc.*

_____/s/
James A. Dunbar
Federal Bar No. 007392
Daniel P. Moylan
Federal Bar No. 024719
Venable LLP
210 Allegheny Avenue
P.O. Box 5517
Towson, Maryland 21285-5517
(410) 494-6200
(410) 821-0147 (fax)

*Attorneys for Defendants
LUI Corporation and James Crystal*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of September, 2003, a copy of the parties' Joint Motion for Extension of Deadlines and proposed Order was served electronically on:

Theodore P. Stein, Esquire
Theodore P. Stein, P.C.
51 Monroe Street, Suite 1200
Rockville, MD 20850

Attorney for Plaintiff Flexcel, Inc.

_____/s/
Daniel P. Moylan

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

FLEXCEL, INC.,

*

Plaintiff,

*

v.

*

Civil Action No. AMD 02CV3825

LUI CORPORATION, *et al.*,

*

Defendants.

*

* * * * *

ORDER

Upon consideration of the parties' Joint Motion for Extension of Deadlines, it is
this ____ day of September, 2003,

ORDERED, that all deadlines in the Scheduling Order in this case are hereby
extended as follows:

Discovery Deadline	10/17/03
Submission of Status Report	10/17/03
Requests for Admission	10/24/03
Dispositive Pretrial Motions	11/17/03

Judge Andre M. Davis
United States District Court Judge